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11 UNITED STATES BANKRUPTCY COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 In re) Case No. 19-30088 (DM)
15 PG&E CORPORATION,)
16) Chapter 11
and)
17) (Lead Case–Jointly Administered)
18 PACIFIC GAS AND ELECTRIC)
COMPANY)
19 Debtors) **MOTION FOR ORDER**
20) **AUTHORIZING WITHDRAWAL OF**
Affects:) **COUNSEL TO SANDRA KELP**
21)
22 ☐ PG&E Corporation)
23 ☐ Pacific Gas & Electric Company)
24 ☒ Both Debtors)
25 * All papers shall be filed in the Lead)
Case, No. 19-30088 (DM).)
26)

1 Robins Cloud LP (“Firm”), counsel of record¹ for creditor, Sandra Kelp (“Creditor”),
2 respectfully submits this Motion for Order Authorizing Withdrawal of Counsel (“Motion”) pursuant to
3 Rules 1001-2, 9013-1, 9013-2, 9013-3 and 9014 of the Bankruptcy Court’s Local Rules.

4 In support of this Motion, the Firm represents as follows:

5 **1. Relevant Facts**

6 **a. General Background**

7 In January 2019, the Debtors filed voluntary Chapter 11 petitions, commencing these cases. Dkt
8 No. 1; Bryson Decl. ¶4.

9 Initially, the Court set a claims bar of October 21, 2019. Dkt. No. 2806. The claims bar date was
10 extended to December 31, 2019, to allow certain fire victims additional time to file claims against the
11 Debtors. Dkt. No. 4651.

12 Jointly, the Debtors proposed a chapter 11 plan of reorganization that, among other things,
13 channeled all fire victim claims to the Fire Victim Trust (“Plan”). Dkt. No. 8048. On June 20, 2020, the
14 Court entered an order confirming Debtors’ Plan. Dkt. No. 8053.

15 **b. Creditor’s Refusal to Communicate with the Firm**

16 In December 2019, the Firm filed Proof of Claim No. 91511 (“Claim”) on behalf of Creditor.
17 Since filing the Claim, the Firm has been unable to communicate with Creditor. Bryson Decl. ¶5. The
18 Firm has attempted to contact Creditor by telephone, email, and letter, all to no avail. *Id.* Creditor
19 refuses to speak or otherwise communicate with the Firm. *Id.* Further, the Firm hired a private
20 investigator to locate Creditor and facilitate communication between the Firm and Creditor. The
21 investigator failed to locate Creditor. Bryson Decl. ¶6.

22 Creditor’s refusal to communicate with the Firm confirms that an irreconcilable breakdown in
23 the attorney-client relationship has developed and Creditor no longer desires to be represented by the
24 Firm. Bryson Decl. ¶7. Based on these circumstances, good cause exists for the Court to enter an order
25 relieving the Firm as counsel of record for Creditor.

26 _____
27 ¹ Robins Cloud LLP retained Grimshaw Law Group, P.C. as bankruptcy counsel to, among other
28 things, assist it in filing this motion. Grimshaw Law Group has no contractual or attorney/client
relationship with Creditor. Declaration of Robert Bryson in Support of Motion for Order Authorizing
Withdrawal of Counsel (“Bryson Decl.”), ¶2, fn.1.

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ROBINS CLOUD LLP

ROBERT BRYSON
Attorneys for Creditor Sandra Kelp

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